

# EXHIBIT 38

## **DECLARATION OF VICTORIA DEMPSEY**

Victoria Dempsey declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. My name is Victoria Dempsey.
2. I am the Program Director of the Youth and Family Advocacy Program at Legal Services of Eastern Missouri. I have worked at Legal Services for five (5) years.
3. The Youth and Family Advocacy Program assists youth and families experiencing homelessness and housing instability by providing supportive case management and civil legal assistance.
4. When providing civil legal assistance to unhoused youth, I frequently act on their behalf as an authorized representative. This allows me to assist them with accessing benefits from the Department of Social Services (DSS).
5. I am the authorized representative of an unhoused youth named T.P. T.P. is 17 years old and lives in St. Louis City.
6. On March 30, 2023, I assisted T.P. in completing a SNAP application and submitting it to DSS.
7. On April 5, 2023 at 4:47PM, I called the call center to complete T.P.'s SNAP eligibility interview. I received an automated message advising me to go to a local resource center to complete the interview. Then, the phone line disconnected. I called back at 4:49PM and was put in a wait queue. I was told that there were fifty (50) individuals ahead of me in line. I was offered the opportunity to "select option 1" to schedule an appointment for a call back. I selected that option, and the line disconnected. I called back after this disconnection, and was told that there were one hundred and nine (109) people ahead of me in the wait queue. I had to terminate the call because I had a meeting, and I could not wait that long to speak to someone.

8. On April 6, 2023 at 8:32AM, I called the call center to complete T.P.'s SNAP eligibility interview. At that time, there were seventy-seven (77) people ahead of me in the wait queue. I called again at 8:34AM, and the queue had seventy-eight (78) people ahead of me. During both of these calls, I selected "option 1" to schedule a callback rather than wait on the phone. Both times the line disconnected without giving me an opportunity to schedule a call back time. I called a third time at 1:29PM, and heard an automated message saying that the Family Support Division would call to complete an interview within three business days of submitting application, and otherwise I should go to my local resource center for assistance. Then, the phone line disconnected.

9. I called the call center on April 10, 2023 at 2:20PM and 2:21PM. Both times, I received an automated message to go to my local resource center to complete the SNAP eligibility interview. There was no option to complete the interview over the phone, and I was automatically disconnected.

10. It was very frustrating that I was unable to complete a SNAP eligibility interview for my client, so I reached out to Attorney Katherine Holley at Legal Services of Eastern Missouri for assistance.

11. With her help I completed my client's interview on April 14, 2023. T.P. now receives \$281 per month in SNAP benefits.

12. T.P. would not have SNAP benefits without help from Legal Services of Eastern Missouri.

Dated: July 27, 2023  
St. Louis, Missouri

*Victoria Dempsey*

